I am commenting on the Notice of Inquiry in FCC Docket 03-65, concerning receiver interference immunity specifications.

Receiver manufacturers have not done a very good job in incorporating technology that keeps televison and radio receivers from receiving interference from amateur radio transmitters. As a licensed Amateur Radio Operator, I receive interference on my television sets and radio receivers when I transmit in the 144-148 MHz spectrum. Even with six watts, that's just too much interference, even at close range. In this area, receiver manufacturers should be required to include circuitry that filters out interference from nearby HF, VHF and UHF amateur radio transmitters.

I also own a shortwave converter for my car radio, due to the lack of innovative and informative programming produced by the illegal corporate monopolies. Luckily, I live 20 miles from the nearest 100 kW FM transmitters, so I can enjoy shortwave programming in my car. When I'm near an AM transmitter, I can easily get the local AM station coming through even with the shortwave converter turned on. Unfortunately, these converters do not include circuitry that filters out interference from nearby AM and FM transmitters. In this area, it would be best if shortwave converters for car radios include circuitry that filters out interference from nearby AM and FM transmitters.

As for car radios in general, facilities to receive IBOC-DAB broadcasts should never be included under any circumstances. Test transmissions have shown that In-Band, On-Channel Digital Audio Broadcasting is totally incompatible with today's receivers; the FCC should give up on the inferior IBOC technology in favor of improving superior analog technology. The task here is to exclude IBOC-DAB from any receiver requirements, and improve on analog technology instead. All receivers sold in the United States should be required to receive Motorola's Compatible Quadrature Amplitude Modulation AM Stereo system, which has basically been perfected. Not only should AM and FM be required in all receivers sold in the United States, but also a minimum of four shortwave broadcast bands (6, 9, 13 and 15 MHz, or the 49, 31, 22 and 19 meter bands) and the NOAA Weather Radio bands (between 162.400 and 162.550 MHz) in the least expensive models; the more expensive models may have more shortwave broadcast bands included. In markets close to the Canadian border (like Detroit or Buffalo), these receivers should also include the L-Band for reception of the Canadian DAB stations. Other minimum requirements included in receivers are circuitry that filters out interference from nearby broadcast, amateur radio, public service and other radio service transmitters, use of digital signal processing technology (such as Motorola's Symphony DSP circuit), and, for radios that include shortwave, the proper circuitry to receive shortwave stations broadcasting with Europe's DRM (Digital Radio Mondiale) system.

As for television receivers, they should not only include circuitry to filter out amateur radio interference, but also circuitry to filter out interference from nearby TV and FM transmitters. The interference is most pronounced on VHF-TV Channel 6. The least expensive television sets usually don't have circuitry to filter out intereference from nearby FM transmitters (especially if one is in a city with a local station on 88.1 MHz, such as St. Louis). I have a pair of black and white television sets; both do not have the necessary circuitry to filter out interference from nearby FM transmitters. The problem at my location is not with KDHX (88.1 MHz), but with KCLC (89.1 MHz), licensed to St. Charles, MO. In addition, I also receive IF interference from KDNL, licensed to St. Louis, MO on UHF-TV Channel 30, on UHF-TV Channel 14. This happens only when my television antenna is pointed toward the station. Therefore, making circuitry that filters out interference from nearby FM and TV

transmitters to all television channels, as well as dual tuners for analog and digital TV, should be required.

The FCC should also abandon the failed "marketplace" approach. The "marketplace" approach has, so far, prevented superior AM Stereo technology from reaching it's full marketplace potential. It has illegally kept the public from hearing the CD-like separation that AM Stereo provides. In addition, the "marketplace" approach has illegally kept the public from having more choices on the radio by not requiring the inclusion of the shortwave broadcast bands. Since the Cold War has long since ended, it's high time that consumers be allowed to have the choice of selecting from literally hundreds of the world's leading shortwave broadcasters without paying a subscription fee. The so-called "marketplace" approach is really anti-market, and takes away consumer rights.

With regard to spectrum management, the FCC has not done a very good job. The FCC should look for a new band for the Department of Defense; their use of the L-Band violates international regulations. The L-Band is reserved for digital audio broadcasting worldwide (the U.S. included). The DoD should clear off the L-Band to make way for the proven Eureka 147 digital audio broadcasting system. The FCC has also done a poor job concerning management of the AM and FM broadcast bands. There are far too many AM radio stations on the air, especially on the "local" channels of 1230, 1240, 1340, 1400, 1450 and 1490 kHz. The FCC should have set aside more FM spectrum long ago for non-commercial educational radio stations; these days, they're the only alternatives (other than the world's shortwave broadcasters) to corporate-controlled radio.

The FCC needs to improve both receiver specifications and spectrum management, if our communications system is ever to be competitive with the rest of the world.